

# **EXHIBIT C-16BB**

**Milbank, Tweed**



780 NORTH WATER STREET  
MILWAUKEE, WISCONSIN 53202-3590

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Lehman Brothers Holdings, Inc. Fee Committee  
Richard Gitlin, Chair

March 8, 2012

Re: Milbank, Tweed

Invoice No. 554857  
Matter No. 009878-16BB

Billing Attorney:  
Brady C. Williamson

Invoice Total	\$ <u>28,079.00</u>
Prior Balance Due	\$ <u>0.00</u>
<b>Total Amount Now Due</b>	<b>\$ <u><u>28,079.00</u></u></b>

PAYMENT IS DUE 30 DAYS FROM DATE OF INVOICE  
PLEASE RETURN THIS COPY WITH YOUR REMITTANCE.

**PLEASE SEND ALL PAYMENTS TO:**  
**GODFREY & KAHN, BIN #318, MILWAUKEE, WI 53288-0318**

FED ID: 39-1128206

WIRE INSTRUCTIONS: BANK NAME: BMO HARRIS BANK N.A. BANK ABA: #075000051 ACCOUNT NAME: GODFREY & KAHN S.C.  
ACCOUNT NO: #291-714 SWIFT CODE: MARLUS 44 (IF INTERNATIONAL WIRE TRANSFER)

OFFICES IN MILWAUKEE, MADISON, WAUKESHA, GREEN BAY, APPLETON WI; AND WASHINGTON, DC



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For Legal Services Rendered Through August 31, 2011

Date	Timekeeper	Description	Hours	Amount
05-04-2011	Carla Andres	Telephone conference with Dennis O'Donnell granting extension for report.	0.10	35.00
05-06-2011	Carla Andres	E-mail to Creditors' Committee counsel regarding fee application issues raised by committee professionals, review response and prepare notes to file.	0.40	140.00
05-06-2011	Katherine Stadler	Conference on negotiations and claimed exceptions to fee and expense rules.	0.30	129.00
05-10-2011	Carla Andres	Begin review of responsive materials.	0.80	280.00
05-11-2011	Carla Andres	Review response detail.	3.10	1,085.00
05-11-2011	Katherine Stadler	Telephone conference on Milbank Tweed response, status, and strategy.	0.60	258.00
05-13-2011	Carla Andres	Review and respond to e-mail regarding call from Mr. O'Donnell.	0.10	35.00
05-13-2011	Katherine Stadler	Telephone conference with Mr. O'Donnell on fee report status and e-mail update.	0.30	129.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
05-16-2011	N. Talbott Settle	Obtain and forward requested materials regarding report response.	0.20	33.00
05-18-2011	Peggy Barlett	Review response from Milbank Tweed to fee committee's report to verify all references to its fee application and explanations for possible objections.	1.10	247.50
05-18-2011	Peggy Barlett	Prepare correspondence regarding specific citation from Milbank Tweed's response to the report.	0.20	45.00
05-19-2011	Carla Andres	Prepare e-mail to Mr. O'Donnell regarding reply.	0.60	210.00
05-20-2011	Carla Andres	E-mails and conference call with Mr. O'Donnell and follow-up call.	0.50	175.00
05-20-2011	Monica Santa Maria	Telephone conference regarding partial Milbank Tweed resolution and instructions for call with Mr. O'Donnell.	0.40	96.00
05-20-2011	Monica Santa Maria	Review correspondence regarding possible settlement with Milbank Tweed in preparation for conference with Mr. O'Donnell.	0.30	72.00
05-20-2011	Monica Santa Maria	Conference with Mr. O'Donnell and Ms. McNamara regarding issues outstanding from report.	1.10	264.00
05-20-2011	Katherine Stadler	Conference on status of settlement negotiations with Milbank Tweed.	0.80	344.00
05-23-2011	Carla Andres	Review summary e-mail from Mr. O'Donnell.	0.20	70.00
05-23-2011	Monica Santa Maria	Review email from Mr. O'Donnell summarizing proposed settlement terms.	0.10	24.00
06-01-2011	Carla Andres	Telephone conference with Dennis O'Donnell regarding resolution of issues regarding multiple attendees.	0.20	70.00
06-05-2011	Brady C. Williamson	Initial review of seventh interim application.	0.60	315.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
06-09-2011	Mary Roufus	Review, download to website and forward notice of adjournment of amended retention application.	0.20	33.00
06-14-2011	Peggy Barlett	Review settlement discussions with Milbank Tweed professionals and prepare stipulation for sixth interim fee period.	1.10	247.50
06-15-2011	Peggy Barlett	Complete stipulation regarding payment to Milbank Tweed for sixth interim fee period fees and expenses.	0.40	90.00
06-28-2011	Sally Granec	Review and profile to the system spreadsheet of the seventh fee period to facilitate attorney review and circulate spreadsheet.	0.50	87.50
06-30-2011	Carla Andres	E-mails regarding fee committee discussions with retained professionals and input on Milbank Tweed response to fee committee, investigate issue.	0.70	245.00
06-30-2011	Peggy Barlett	Review e-mails regarding fee review and time spent by professionals, specifically Milbank Tweed, in preparing documents relating to the fee committee and fee review standards.	0.30	67.50
06-30-2011	Katherine Stadler	E-mail exchange on coordination between firms on fee committee position.	0.20	86.00
07-01-2011	Carla Andres	E-mails regarding draft brief to fee committee.	0.20	70.00
07-01-2011	Carla Andres	E-mail regarding consistency issues in fee review.	0.10	35.00
07-02-2011	Peggy Barlett	Begin reviewing seventh fee detail.	1.30	292.50
07-02-2011	Peggy Barlett	Review seventh interim fee application.	0.90	202.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07-08-2011	Peggy Barlett	Continue review of seventh fee application billing details to identify objectionable entries.	1.60	360.00
07-09-2011	Peggy Barlett	Continue review of seventh interim fee detail, identifying objectionable entries.	2.20	495.00
07-12-2011	Peggy Barlett	Continue review of seventh interim fee detail, identifying objectionable entries.	0.60	135.00
07-14-2011	Peggy Barlett	Continue review of seventh interim fee detail, identifying objectionable entries.	2.50	562.50
07-17-2011	Peggy Barlett	Review seventh period fee detail.	0.90	202.50
07-18-2011	Peggy Barlett	Continue reviewing seventh period fee detail.	0.50	112.50
07-20-2011	Carla Andres	E-mails regarding expanded retention proposal.	0.20	70.00
07-20-2011	Peggy Barlett	E-mail regarding review of Milbank Tweed seventh fee period for retention issues.	0.10	22.50
07-21-2011	Carla Andres	Conferences regarding Pyxis engagement.	0.30	105.00
07-21-2011	Peggy Barlett	Review correspondence and time entries regarding Pyxis and issues of duplication with other professionals.	0.20	45.00
07-23-2011	Peggy Barlett	Continue fee detail review for seventh fee period, identifying objectionable entries.	3.20	720.00
07-26-2011	Zerithea Raiche	Review and forward exhibit spreadsheet for Milbank Tweed's seventh fee period application.	0.40	66.00
07-26-2011	Peggy Barlett	Continue fee detail review for seventh fee period, identifying objectionable entries.	10.30	2,317.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
07-27-2011	Peggy Barlett	Continue review of fee detail for seventh fee period, identifying objectionable entries.	7.80	1,755.00
07-27-2011	Brady C. Williamson	Review fee statement.	0.80	420.00
07-28-2011	Carla Andres	Conference regarding status of time detail review and associated issues.	0.20	70.00
07-28-2011	Peggy Barlett	Complete fee and expense review for seventh fee period, identifying objectionable entries.	5.90	1,327.50
07-30-2011	Zerithea Raiche	Conferences on spreadsheet review and review email on exhibit calculations for seventh fee period application.	0.40	66.00
07-30-2011	Peggy Barlett	Revise seventh fee period letter report.	0.40	90.00
07-30-2011	Peggy Barlett	Revise objection list and summary notes regarding seventh fee period.	2.80	630.00
07-30-2011	Peggy Barlett	Conference regarding Milbank Tweed exhibit preparation and formatting issues.	0.30	67.50
07-30-2011	Peggy Barlett	Prepare correspondence detailing review of Milbank Tweed and status of confidential letter report.	0.20	45.00
07-31-2011	Zerithea Raiche	Review and revise exhibit spreadsheet for the seventh interim fee period application.	1.70	280.50
08-01-2011	Peggy Barlett	Revise letter report to include all template language and categories for objections.	1.20	270.00
08-02-2011	Carla Andres	Telephone conference with Mr. O'Donnell regarding form stipulation and timing of order, telephone conference on change to stipulation format.	0.20	70.00
08-03-2011	Carla Andres	Review exhibits and mark comments.	2.20	770.00

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-03-2011	Carla Andres	E-mail Mr. O'Donnell draft stipulation, telephone conference regarding exhibit and report status.	0.40	140.00
08-03-2011	Carla Andres	Review draft report and telephone conference on comments.	0.30	105.00
08-04-2011	Carla Andres	Review and respond to e-mail on changes to letter report.	0.20	70.00
08-04-2011	Peggy Barlett	Telephone conference regarding notes in Milbank Tweed spreadsheet identifying problem entries.	0.20	45.00
08-04-2011	Peggy Barlett	Fact-check and reorganize exhibits for seventh fee period in preparation for exhibit preparation.	4.50	1,012.50
08-05-2011	Carla Andres	Review voice mail from Mr. O'Donnell regarding stipulation and order process, review draft Milbank Tweed seventh interim report.	0.40	140.00
08-05-2011	Peggy Barlett	Review March 31, 2011 letter from Milbank Tweed detailing yearly rate increases.	0.60	135.00
08-05-2011	Peggy Barlett	Conference regarding revisions to Milbank Tweed letter.	0.10	22.50
08-05-2011	Peggy Barlett	Review and revise letter report section on rate increases from 2010-2011.	1.70	382.50
08-05-2011	Peggy Barlett	Conference on letter section on rate increases.	0.10	22.50
08-05-2011	Brady C. Williamson	Review and revise letter report.	0.50	262.50
08-05-2011	Katherine Stadler	Review and revise draft letter report.	0.60	258.00
08-08-2011	Peggy Barlett	Revise seventh confidential letter report to include all template language, U.S. Trustee's comments and final objections.	1.50	337.50



<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-10-2011	Zerithea Raiche	Prepare spreadsheet for exhibit preparation.	6.70	1,105.50
08-10-2011	Zerithea Raiche	Prepare list of exhibit designations with percentage reductions.	0.70	115.50
08-10-2011	Zerithea Raiche	Review supplemental detail to seventh fee period application for preparation of report exhibits.	0.90	148.50
08-11-2011	Zerithea Raiche	Revise spreadsheet for exhibit preparation.	1.90	313.50
08-11-2011	Zerithea Raiche	Email to BrownGreer with detailed instructions on preparation of exhibits.	0.30	49.50
08-11-2011	Zerithea Raiche	Prepare list of exhibit designations and percentages for use in preparation of seventh fee period report.	0.60	99.00
08-11-2011	Peggy Barlett	Review and respond to e-mail on changes to exhibit designations before exhibit preparation.	0.40	90.00
08-12-2011	Carla Andres	Review U.S. Trustee comments on letter report and revised draft, e-mail regarding comments on final report.	0.30	105.00
08-12-2011	Zerithea Raiche	Respond to questions on preparation of exhibits to seventh fee period report.	0.80	132.00
08-12-2011	Peggy Barlett	Revise report to incorporate U.S. Trustee's revisions.	0.90	202.50
08-13-2011	N. Talbott Settle	Review and verify report exhibits.	1.40	231.00
08-15-2011	N. Talbott Settle	Review correspondence from Ms. Barbour with exhibits to report.	0.40	66.00
08-15-2011	Peggy Barlett	Review fee exhibits and verify amounts and objections listed.	1.10	247.50
08-15-2011	Peggy Barlett	Revise report to incorporate updated amounts.	0.70	157.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-15-2011	Peggy Barlett	Review expense exhibits and cross-reference with additional supplemental entries from Milbank Tweed.	1.80	405.00
08-15-2011	Peggy Barlett	Additional revisions to report.	0.50	112.50
08-15-2011	Peggy Barlett	Prepare correspondence regarding status of report and revisions to exhibits.	0.20	45.00
08-16-2011	Carla Andres	Telephone conference with Mr. O'Donnell regarding preparation of order on sixth interim fee application, conference and emails on seventh interim exhibits and letter report.	0.40	140.00
08-16-2011	Zerithea Raiche	Verify calculations in seventh fee period report.	2.90	478.50
08-16-2011	Zerithea Raiche	Verify record citations in seventh fee period report.	1.30	214.50
08-16-2011	Zerithea Raiche	Revise calculations in exhibit spreadsheet for report.	1.80	297.00
08-16-2011	Zerithea Raiche	Prepare email with seventh fee period report and exhibits.	0.20	33.00
08-17-2011	Carla Andres	Review final letter report, e-mail from Mr. O'Donnell regarding order.	0.30	105.00
08-17-2011	Zerithea Raiche	Verify calculations in seventh fee period report.	0.30	49.50
08-17-2011	Zerithea Raiche	Verify record citations for added sections in seventh fee period report.	0.40	66.00
08-17-2011	Peggy Barlett	Review and respond to correspondence regarding revised exhibits.	0.10	22.50
08-17-2011	Peggy Barlett	Conference regarding review of reduction amounts and issues with certain objections.	0.10	22.50

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
08-17-2011	Peggy Barlett	Review revised exhibits.	0.90	202.50
08-17-2011	Peggy Barlett	Additional updates to seventh fee period report.	0.60	135.00
08-18-2011	N. Talbott Settle	Correspondence to Ms. Conis forwarding report and exhibits.	0.40	66.00
08-23-2011	Carla Andres	E-mails with Mr. O'Donnell regarding conference request.	0.10	35.00
08-24-2011	Carla Andres	Conference with Mr. O'Donnell and Ms. Conis regarding issues raised in letter report.	1.00	350.00
08-24-2011	Carla Andres	Review letter report in connection with pending telephone conference.	0.40	140.00
08-24-2011	Brady C. Williamson	Return call from Mr. O'Donnell on compensation for fee memorandum.	0.20	105.00
08-24-2011	Katherine Stadler	Conferences with Mr. Purcell on compensation of time for research memorandum on fee committee dispute issues.	0.70	301.00
08-25-2011	Carla Andres	Review and respond to e-mail regarding increased reductions, e-mails regarding areas of concern expressed by Mr. O'Donnell, e-mail regarding inconsistencies in proposed sixth interim order.	0.50	175.00
08-25-2011	Brady C. Williamson	Conference call with Mr. O'Donnell on a series of issues: charges for memorandum on fees, hourly rate increases and transient billers.	0.80	420.00
08-25-2011	Katherine Stadler	Prepare background materials for conference with Mr. O'Donnell and status update.	0.60	258.00
08-26-2011	Brady C. Williamson	Email from Mr. O'Donnell on fee question and background material.	0.20	105.00
08-26-2011	Brady C. Williamson	Evaluate response to Mr. O'Donnell's position on fee memorandum and rate increases.	0.70	367.50

Date	Timekeeper	Description	Hours	Amount
08-26-2011	Katherine Stadler	Review prior correspondence and hearing transcripts on research memorandum drafted by Milbank Tweed in preparation for litigation with the fee committee.	1.30	559.00
08-26-2011	Katherine Stadler	Telephone conference with U.S. Trustee's office, Mr. Velez-Rivera, on his recollection of the August 2010 chambers' conference.	0.30	129.00
08-26-2011	Katherine Stadler	Draft memorandum to Mr. Gitlin on status of payment.	0.20	86.00
08-31-2011	Carla Andres	E-mails and conferences regarding BrownGreer reports for eighth interim period.	0.20	70.00
Total Fees			\$	28,079.00
Total Disbursements			\$	<u>0.00</u>
Total For This Invoice			\$	<u><b>28,079.00</b></u>

### Time and Fee Summary

Timekeeper	Title	Hours	Rate	Amount
CARLA ANDRES	Special Counsel	14.60	350.00	5,110.00
<b>Special Counsel Total</b>		<b>14.60</b>		<b>5,110.00</b>
ZERITHEA RAICHE	Paralegal	21.30	165.00	3,514.50
N. TALBOTT SETTLE	Paralegal	2.40	165.00	396.00
MARY ROUFUS	Paralegal	0.20	165.00	33.00
SALLY GRANEC	Paralegal	0.50	175.00	87.50
<b>Paralegal Total</b>		<b>24.40</b>		<b>4,031.00</b>
MONICA SANTA MARIA	Associate	1.90	240.00	456.00
PEGGY BARLETT	Associate	62.00	225.00	13,950.00
<b>Associate Total</b>		<b>63.90</b>		<b>14,406.00</b>
BRADY C. WILLIAMSON	Shareholder	3.80	525.00	1,995.00
KATHERINE STADLER	Shareholder	5.90	430.00	2,537.00
<b>Shareholder Total</b>		<b>9.70</b>		<b>4,532.00</b>
<b>TIMEKEEPER TOTALS</b>		<b>112.60</b>		<b>\$28,079.00</b>

*We adjust our hourly billing rates effective January 1 of each year. Accordingly, billing rate changes are reflected on this statement for work performed in 2012. Information regarding the hourly rates applicable to our attorneys and other personnel working on your matters is available on request from our billing department.*